

SHANNON LISS-RIORDAN (SBN 310719)

(sliss@llrlaw.com)

ANNE KRAMER (SBN 315131)

(akramer@llrlaw.com)

LICHTEN & LISS-RIORDAN, P.C.

729 Boylston Street, Suite 2000

Boston, MA 02116

Telephone: (617) 994-5800

Facsimile: (617) 994-5801

*Attorneys for Plaintiff Kent Hassell,  
on behalf of himself and all others similarly situated.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA**

KENT HASSELL, individually and on behalf of  
all others similarly situated,

Plaintiff,

v.

UBER TECHNOLOGIES, INC., d/b/a UBER  
EATS,

Defendant.

Case No. 4:20-cv-04062

**JOINT STIPULATION AND ~~PROPOSED~~  
ORDER TO STAY ACTION IN LIGHT OF  
PROPOSED SETTLEMENT**

Complaint Filed: June 18, 2020

Trial Date: None Set

Pursuant to Civil Local Rule 7-12, Plaintiff Kent Hassell (“Plaintiff”) and Defendant Uber Technologies, Inc. (“Defendant”) (collectively, “Parties”) by and through their respective counsel of record, hereby stipulate as follows:

WHEREAS, on January 4, 2021, Plaintiff filed a Notice of Filing of First Amended Complaint against Defendant;

WHEREAS, on January 6, 2021, at the Clerk’s direction, Plaintiff re-filed his First Amended Complaint directly (and not as an exhibit to the notice);

WHEREAS, the deadlines for Plaintiff’s Motion for Class Certification and Motion for Summary Judgment are currently set for February 17, 2022;

WHEREAS, the Parties have reached a tentative resolution of this matter and have filed a Motion for Preliminary Approval of Class Action Settlement in the related case, James v. Uber Technologies, Inc. Case No. 19-CV-06462-EMC (N.D. Cal.) on February 17, 2022, which would resolve all pending claims in this matter;

WHEREAS, in order to conserve costs and judicial resources, and in the interests of efficiency and economy, the Parties request that all hearings be vacated and all deadlines, including but not limited to Plaintiff’s deadlines to file his Motion for Class Certification and Motion for Summary Judgment, be suspended while the parties finalize the settlement;

NOW THEREFORE, the Parties hereby stipulate, agree, and respectfully request that the Court enter an Order establishing the following:

This action shall be stayed in light of the parties’ proposed settlement.

**IT IS SO STIPULATED.**

1  
2 Dated: February 17, 2022

Respectfully submitted,

LICHTEN & LISS-RIORDAN, P.C.

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4 /s/ Shannon Liss-Riordan

Shannon Liss-Riordan

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6 *Attorney for Plaintiff KENT HASSELL, on*  
7 *behalf of himself and all others similarly*  
8 *situated.*

9  
10 Dated: February 17, 2022

LITTLER MENDELSON, P.C.

11  
12 /s/ Sophia Behnia

Sophia Behnia

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14 *Attorney for Defendant Uber*  
15 *Technologies, Inc.*

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19 **PURSUANT TO STIPULATION, IT IS SO ORDERED.**

20 February 22, 2022

21 Hon. Phyllis J.

